

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARTHUR EDWARD SUAREZ, JR.,  
KENDRA DEANNE SINGLETARY,  
DANA MICHAELLE STOKES,  
TONEY EUGENE BAHE,  
NATHAN ALLEN LEWELLING,  
KENNETH WAYNE TONEY,  
OSMAN ROLANDO SANCHEZ,  
KAYLA MARISA BRADFORD,  
JEREMY NATHANIEL STAGE,

Defendants.

Case No. 24-CR-0372-SEH

**Government's Notice of Intent to Offer Expert Witness Testimony**

The United States submits this Notice of Intent to Offer Expert Witness Testimony under Fed R. Evid. 702, 703, and 705 and Fed. R. Crim. P. 16(a)(1)(G)(i). The United States intends to call the following witness from the DEA South Central Laboratory:<sup>1</sup>

- KeiSharra Eldridge, Senior Forensic Chemist (Exhibit A);
- Paul Galat, Senior Forensic Chemist (Exhibit B);
- Kevin Roberson, Forensic Chemist (Exhibit C);
- Vanessa Torres De Leon, Senior Forensic Chemist (Exhibit D);
- Brandon Wilson, Senior Forensic Chemist (Exhibit E);

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<sup>1</sup> All laboratory reports (in discovery) have a signed statement by each DEA forensic chemist.

From the OBN Laboratory:<sup>2</sup>

- Kevin Kramer
- Elizabeth Smith

The witness's curriculum vitae, containing a list of trial testimony from the last four years, is attached as an exhibit. The Government intends to call this witness as an expert in controlled substance analysis. The witness will testify as to procedure and methodology for testing for controlled substances, handling of evidence and documentation of same.

The witness will testify that her analysis involved the application of scientific disciplines including chemistry and forensic science. The witness will testify consistently with the controlled substance analysis reports that were included as part of the government's discovery.

The Government reserves the right to question the experts regarding other matters that may be raised during cross-examination by Defendant, based upon the testimony elicited from Defendant's experts, if any, or other witnesses, or the evidence introduced by Defendant. To the extent the Court allows Defendant the same right, the government reserves the right to elicit any additional testimony that

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<sup>2</sup> Due to the holiday, the Government was unable to obtain a signed statement of opinions or CV before the Notice date. (Dkt. #63). The Government is in the process of obtaining the statements and will file those signed statements/CV as soon as possible.

these experts are qualified to provide should the need arise based on further developments in preparing for and during the trial.

The Government also reserves the right, within the limitations set by law and the Court, to amend this notice if the defense provides additional disclosure and to call additional expert witnesses if the need arises after the date of this filing.

At the time of this Notice, Defendants Kenneth Wayne Toney, Osman Rolando Sanchez, and Jeremy Nathaniel Stage remain at large with an active federal arrest warrants.

Respectfully submitted,

CLINTON J. JOHNSON  
United States Attorney

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### Certificate of Service

I hereby certify that on the 30th day of December, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Kathrine Greubel  
*Defense Counsel for Suarez Jr.*

Taylor McLawhorn  
*Defense Counsel for Singletary*

Jason Perkins  
*Defense Counsel for Stokes*

Michael Noland  
*Defense Counsel for Bahe*

Kara Pratt  
*Defense Counsel for Lewelling*

Collin Rockett  
*Defense Counsel for Bradford*

/s/ Mandy M. Mackenzie  
Mandy M. Mackenzie  
Assistant United States Attorney